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APPENDIX B

CONSUMER ECONOMIC LOSS PLAINTIFFS' VARIED VCD PRESCRIPTION FILLS1

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
1	Anderson, Marlin	65862-0547-90	Valsartan/HCTZ 80mg/12.5mg	Aurobindo	CVS

¹ Information included in this chart is largely drawn from Pharmacy Defendant Fact Sheets. Where the plaintiff filled from a non-defendant pharmacy, the information is largely drawn from the Plaintiff Fact Sheet. Defendants, however, do not concede that the information in the Plaintiff Fact Sheets is accurate. All sources for the information herein are included in Defendants' Opposition Exhibits 123-188.

² Inclusion of an NDC in this chart is not an admission that the plaintiff paid any amount out of pocket for that product, that it was filled prior to the recalls, or that the product is "at-issue" in the plaintiff's case. As shown throughout this chart, the plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint (ECF 1708) ("ELMC"), is often inconsistent with other records in the case, such as the Plaintiff's Fact Sheet and pharmacy records, so it is not clear which products/fills are actually "at issue" in many cases.

³ Wholesaler involvement in a Class Representative's purchase of any particular VCD NDC at issue simply cannot be determined. Particularly, the collective Retailer DFSs may not be used to accurately establish Wholesaler involvement in transactions with the Subject Class Representatives as they: (1) cover the entire discovery relevant time period, 2012-2019, rather than the narrow time period related to the dates of a Class Representative's purchase of a VCD NDC in issue; and (2) reflect the purchases of a VCD NDC in issue by all of the chain's locations, rather than by the specific location from which the Class Representative made purchases. As a result, Retailer DFSs may inaccurately suggest involvement by a Wholesaler when, in fact, there were no purchases by that Retail Pharmacy location from that Wholesaler during the time period when the Class Representative purchased the VCD NDC in issue. Moreover, apart from the Retailer DFSs, it is undisputed that there is no documentary evidence before the Court, no possible manipulation of the various Fact Sheets or purchase and sales data, and no expert testimony offered that would allow the determination of whether any Wholesaler, in general, or a specific Wholesaler, in particular, was involved in a particular transaction. This result is because: (1) NDC numbers do not disclose Wholesaler involvement; (2) lot numbers at the patient level would be required to make such an identification; and (3) such lot-level data at the patient level indisputably does not exist, because Wholesalers were not legally required to, and did not, transmit lot information to pharmacies. *See* Opposition of Wholesaler Defendants to Plaintiffs' Motion for Class Certification of the Consumer and Third Party Payor Economic Loss Claims (submitted concurrently hereto).

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
		65862-0549-90	Valsartan/HCTZ 160mg/25mg	Aurobindo	CVS
		00378-6323-77	Valsartan/HCTZ 160mg/25mg	Mylan	CVS
		43547-0369-09	Valsartan 160mg	ZHP ⁴	Walgreens ⁵
2	Andre, Merilyn	52343-0125-90	Valsartan 320mg	Acetris (Aurobindo)	Express Scripts
		43547-0369-09	Valsartan 160mg	ZHP	Sav-On (Albertsons) ⁶
3	Bell, Sandy	65862-0549-90	Valsartan/HCTZ 160mg/25mg	Aurobindo	CVS
		00378-6323-77	Valsartan/HCTZ 320mg/25mg	Aurobindo	CVS

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⁴ No ZHP product is identified in Ms. Anderson's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 45.

⁵ Walgreens is not identified in Ms. Anderson's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 45.

⁶ Ms. Andre is particularly inadequate and atypical to be approved as the sole named class representative for the proposed Albertsons' sub-classes, as Ms. Andre paid Sav-On but a one-off co-pay for just a *single* bottle of valsartan product which she testified (and her records show) she did not use in full before being instructed by her doctor to stop taking the product. Ex. 26, Dep. of Merilyn Andre ("Andre Dep.") 69:9-25, 120:8-123:25, Nov. 30, 2021. Ms. Andre is also deficient in this capacity because she is not a named class representative as against the manufacturer of the single product purchased from Sav-On.

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
		43547-0315-09	Valsartan/HCTZ 320mg/25mg	ZHP ⁷	CVS
4	Borkowski, Alphonse	43547-0315-09	Valsartan/HCTZ 320mg/25mg	ZHP	Rite Aid
	Tupnouse	65862-0551-90	Valsartan/HCTZ 320mg/25mg	Aurobindo ⁸	Rite Aid
		65862-0549-90	Valsartan/HCTZ 160mg/25mg	Aurobindo ⁹	Rite Aid
5	Bruner, Billy Joe	43547-0370-09	Valsartan 320mg	ZHP	Walgreens
		65862-0573-90	Valsartan 320mg	Aurobindo ¹⁰	CVS ¹¹
6	Burnett, Gary	43547-0313-09	Valsartan HCTZ 160mg/25mg	ZHP	Walmart

⁷ No ZHP product is identified in Ms. Bell's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 14.

⁸ No Aurobindo product is identified in Mr. Borkowski's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 15.

⁹ No Aurobindo product is identified in Mr. Borkowski's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 15.

¹⁰ No Aurobindo product is identified in Mr. Bruner's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 16.

¹¹ CVS is not identified in Mr. Bruner's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 16.

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
7	Cacaccio, Joseph	00378-5814-77	Valsartan 160mg	Mylan	Rite Aid
		43547-0315-09	Valsartan/HCTZ 320mg/25mg	ZHP	Rite Aid
		65862-0551-90	Valsartan/HCTZ 320mg/25mg	Aurobindo	Rite Aid
8	Childs, James	43547-0368-09	Valsartan 80mg	ZHP	Main Line Health Pharmacy (not a defendant)
		65862-0571-90	Valsartan 80mg	Aurobindo	Main Line Health Pharmacy (not a defendant)
		31722-0746-90	Valsartan 80mg	Hetero ¹²	Main Line Health Pharmacy (not a defendant)
		00378-5813-77	Valsartan 80mg	Mylan ¹³	Main Line Health Pharmacy (not a defendant)
9	Cisneros, Samuel	13668-0070-90	Valsartan 320mg	Torrent	Walmart

¹² No Hetero product is listed in Mr. Child's Plaintiff Fact Sheet (Exhibit 134), but records from Main Line Health Pharmacy that Defendants were able to procure included this product (Exhibit 133).

¹³ No Mylan product is listed in Mr. Child's Plaintiff Fact Sheet (Exhibit 134), but records from Main Line Health Pharmacy that Plaintiff produced included this product (Exhibit 133).

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
		43547-0370-09	Valsartan 320mg	ZHP ¹⁴	Walmart
10	Cooper, Glenda	00378-5814-77	Valsartan 160mg	Mylan	Smith Drug Company (not a defendant)
		43547-0369-09	Valsartan 160mg	ZHP	Smith Drug Company (not a defendant)
11	Crocker, Linda	65862-0571-90	Valsartan 80mg	Aurobindo	Hannaford Food & Drug (not a defendant)
12	Deutenberg, Eleonora (Estate of)	43547-0369-09	Valsartan 160mg	ZHP	Walgreens
	Liconora (Listate 61)	43547-0370-09	Valsartan 320mg	ZHP	Medix Pharmacy (not a defendant)
		65862-0572-90	Valsartan 160mg	Aurobindo	CVS
13	Dudley, Miranda	43547-0315-09 ¹⁵	Valsartan/HCTZ 320mg/25mg	ZHP	Beulaville Pharmacy (not a defendant)
		43547-0367-03	Valsartan 40mg	ZHP	delendant)

¹⁴ No ZHP product is identified in Mr. Cisneros's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 59.

¹⁵ This NDC is not included in Ms. Dudley's Plaintiff Fact Sheet (Exhibit 142), but records from Beaulaville Pharmacy that Plaintiff produced included this product (Exhibit 141).

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
		00591-2319-19	Valsartan/HCTZ 320mg/25mg	Teva	
14	Duffy, John	43547-0370-09	Valsartan 320mg	ZHP	Walgreens
15	Edwards, Lawrence	00378-6322-77	Valsartan/HCTZ 160mg/12.5mg	Mylan	CVS
		65862-0548-90	Valsartan/HCTZ 160mg/12.5mg	Aurobindo	CVS Rite Aid
16	Erwin, Eric	43547-0369-09	Valsartan 160mg	ZHP	Walgreens
		00093-7690-56	Amlodipine /Valsartan 5mg/160mg	Teva	Walgreens
		65862-0737-30	Amlodipine /Valsartan 5mg/160mg	Aurobindo	Walgreens
17	Gildner, Leland	31722-0747-90	Valsartan 160mg	Hetero	Kroger
18	Glab, Marzanna	00378-6324-77	Valsartan/HCTZ 320mg/12.5mg	Mylan	CVS
		65862-0550-90	Valsartan/HCTZ 160mg/12.5mg	Aurobindo	CVS
19	Hays, Mark	31722-0747-90	Valsartan 160mg	Hetero	Express Scripts

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
		00378-6322-05	Valsartan/HCTZ 160mg/12.5mg	Mylan	Express Scripts
		65862-0573-90	Valsartan 320mg	Aurobindo	CVS
20	Johnson, Jennifer	65862-0547-90	Valsartan/HCTZ 80mg/12.5mg	Aurobindo	Walmart
		43547-0311-09	Valsartan/HCTZ 80mg/12.5mg	ZHP	Walmart
21	Johnston, Charles	43547-0369-09	Valsartan 160mg	ZHP	Optum Rx
22	Kaplan, Dennis	43547-0315-09	Valsartan/HCTZ 320mg/25mg	ZHP	Rite Aid
		65862-0551-90	Valsartan/HCTZ 320mg/25mg	Aurobindo	Rite Aid
		65862-0550-90	Valsartan/HCTZ 160mg/12.5mg	Aurobindo	Rite Aid
23	Kelly, Sandra	65862-0548-90	Valsartan/HCTZ 160mg/12.5mg	Aurobindo ¹⁶	Emerging Home Care Pharmacy (not a defendant)
		65862-0551-90	Valsartan/HCTZ 320mg/25mg	Aurobindo ¹⁷	

¹⁶ No Aurobindo product is identified in Ms. Kelly's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 48.

¹⁷ No Aurobindo product is identified in Ms. Kelly's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 48.

	Plaintiff Name	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
		00378-5815-77	Valsartan 320mg	Mylan ¹⁸	
		65862-0573-90	Valsartan 320mg	Aurobindo ¹⁹	
		43547-0370-09	Valsartan 320mg	ZHP	
		00591-2170-19	Valsartan 320mg	Actavis (Teva) ²⁰	
24	Kessinger, Joseph	65862-0573-90	Valsartan 320mg	Aurobindo	CVS
		65862-0572-90	Valsartan 160mg	Aurobindo	CVS
25	Lamy, Asha	00378-6325-77	Valsartan/HCTZ 320mg/25mg	Mylan	Kroger
26	Lawson, James	00378-6325-77	Valsartan/HCTZ 320mg/25mg	Mylan	CVS
		65862-0551-90	Valsartan/HCTZ 320mg/25mg	Aurobindo	CVS

¹⁸ No Mylan product is identified in Ms. Kelly's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 48.

¹⁹ No Aurobindo product is identified in Ms. Kelly's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 48.

²⁰ No Teva product is identified in Ms. Kelly's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 48.

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
27	Lee, Jynona	13668-0205-30	Amlodipine / Valsartan 5mg/320mg	Torrent	Walmart
		13668-0204-30	Amlodipine / Valsartan 10mg/320mg	Torrent	Walmart
28	Longwell, Veronica	31722-0745-30	Valsartan 40mg	Hetero	Express Scripts ²¹
		31722-0746-90	Valsartan 80mg	Hetero	CVS
		31722-0747-90	Valsartan 160mg	Hetero	CVS
		65862-0547-90	Valsartan/HCTZ 80mg/12.5mg	Aurobindo	CVS
29	McGilvery, Flora	43547-0312-09	Valsartan/HCTZ 160mg/12.5mg	ZHP	Walmart Express Scripts ²²

²¹ Express Scripts is not identified in Ms. Longwell's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 26.

²² Express Scripts is not identified in Ms. McGilvery's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 27.

²³ Express Scripts is not identified in Ms. McLean's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 37.

²⁴ No ZHP product is identified in Mr. Meader's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 39.

²⁵ No Teva product is identified in Mr. Meader's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 39.

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
		00093-7693-56	Amlodipine / Valsartan 10mg/320mg	Teva	Walgreens
		65862-0572-90	Valsartan 160mg	Aurobindo ²⁶	CVS
		00378-5814-77	Valsartan 160mg	Mylan ²⁷	CVS
33	Molinaro, Ronald	43547-0370-09	Valsartan 320mg	ZHP	CVS
		43547-0315-09	Valsartan/HCTZ 320mg/25mg	ZHP	CVS
34	Mullins, Cheryl	43547-0312-09 ²⁸	Valsartan/HCTZ 160mg/12.5mg	ZHP	Lonesome Pine (not a defendant)
		43547-0311-09	Valsartan/HCTZ 80mg/12.5mg	ZHP	
35	Neal, Talsie	43547-0315-09	Valsartan/HCTZ 320mg/25mg	ZHP	Walmart
36	Nelson, Gerald	65862-0573-90	Valsartan 320mg	Aurobindo	Rite Aid

 $^{^{26}}$ No Aurobindo product is identified in Ms. Means's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 53.

²⁷ No Mylan product is identified in Ms. Means's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 53.

²⁸ This NDC is not included in Ms. Mullins's Plaintiff Fact Sheet (Exhibit 173), but records from Lonesome Pine Pharmacy that Plaintiff produced included this product (Exhibit 172).

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
		65862-0551-90	Valsartan/HCTZ 320mg/25mg	Aurobindo	Rite Aid
					CVS
		00591-2319-19	Valsartan/HCTZ 320mg/25mg	Actavis (Teva)	Rite Aid
		43547-0315-09	Valsartan/HCTZ 320mg/25mg	ZHP	Rite Aid
		00378-6325-77	Valsartan/HCTZ 320mg/25mg	Mylan	CVS
37	O'Brien, Peter	31722-0747-90	Valsartan 160mg	Hetero	CVS
38	Powell, Lubertha	43547-0369-09	Valsartan 160mg	ZHP	Hephzibah Pharmacy ²⁹ (not a defendant)
				20	Walgreens
		13668-0069-90	Valsartan 160mg	Torrent ³⁰	Barney's Pharmacy (not a defendant)

²⁹ Ms. Powell did not identify Hephzibah Pharmacy in her Plaintiff Fact Sheet (Exhibit 179), and did not produce records from that pharmacy, but Defendants were able to collect records from that pharmacy (Exhibit 178) that show fills of this NDC from Hephzibah Pharmacy.

³⁰ No Torrent product is identified in Ms. Powell's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 33.

	Plaintiff Name	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
		31722-0747-90	Valsartan 160mg	Hetero ³¹	Barney's Pharmacy (not a defendant)
		00378-6323-77 ³²	Valsartan/HCTZ 160mg/25mg	Mylan ³³	Hephzibah Pharmacy ³⁴ (not a defendant)
39	Roberts, Robin	13668-0204-30	Amlodipine / Valsartan 10mg/320mg	Torrent	Walmart Walgreens
		00093-7693-56	Amlodipine / Valsartan 10mg/320mg	Teva	Walgreens

³¹ No Hetero product is identified in Ms. Powell's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 33.

³² This NDC is not included in Ms. Powell's Plaintiff Fact Sheet (Exhibit 179).

³³ No Mylan product is identified in Ms. Powell's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 33.

³⁴ Ms. Powell did not identify Hephzibah Pharmacy in her Plaintiff Fact Sheet (Exhibit 179), and did not produce records from that pharmacy, nor did she identify this NDC in her Plaintiff Fact Sheet, but Defendants were able to collect records from that pharmacy (Exhibit 178) that show fills of this NDC from Hephzibah Pharmacy.

	<u>Plaintiff Name</u>	Manufacturer Defendants' NDC(s) Dispensed ²	<u>Product</u>	<u>Manufacturer</u>	Filled from Which Pharmacy/(ies) ³
40	Semmel, Lawrence	65862-0548-90	Valsartan/HCTZ 160mg/12.5mg	Aurobindo ³⁵	Weis Pharmacy (not a defendant)
		31722-0748-90	Valsartan 320mg	Hetero ³⁶	Weis Pharmacy (not a defendant)
		43547-0370-09	Valsartan 320mg	ZHP	CVS
41	Shetty, Radhakrishna	43547-0367-03	Valsartan 40mg	ZHP	Walgreens
42	Sims, Antoinette	65862-0551-90 ³⁷	Valsartan/HCTZ 320mg/25mg	Aurobindo	Heights Specialty Pharmacy (not a defendant)
43	Wineinger, Brian	43547-0370-09	Valsartan 320mg	ZHP	Walmart

 $^{^{35}}$ No Aurobindo product is identified in Mr. Semmel's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 23.

³⁶ No Hetero product is identified in Mr. Semmel's plaintiff-specific paragraph of the Third Amended Consolidated Economic Loss Class Action Complaint. ELMC ¶ 23.

³⁷ Ms. Sims's Plaintiff Fact Sheet (Exhibit 187) incorrectly lists the NDC for this product, but it is accurately included in the Heights Specialty Pharmacy Records Ms. Sims produced in this case (Exhibit 186).